

Amy L. Bennecoff (275805)  
Kimmel & Silverman, P.C.  
30 East Butler Pike  
Ambler, PA 19002  
Telephone: 215-540-8888  
Facsimile: 215-540-8817  
abennecoff@creditlaw.com  
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

KIM BAILEY,	)	
	)	
Plaintiff,	)	<b>Case No.: 2:16-cv-02279</b>
v.	)	
	)	
PROGRESSIVE MANAGEMENT	)	<b>STIPULATION FOR DISMISSAL</b>
SYSTEMS,	)	<b>OF ACTION WITH PREJUDICE</b>
	)	
Defendants.	)	
	)	
	)	

**TO THE CLERK:**

Plaintiff, KIM BAILEY (herein after “Plaintiff”), and Defendant, R.M. GALICIA, INC. dba PROGRESSIVE MANAGEMENT SYSTEMS (hereinafter “Defendants”), (all jointly hereinafter referred to as “the Parties”), hereby move to dismiss the action with prejudice, and in support of this Motion hereby say:

1. This matter is resolved between the parties.
2. The Parties to the litigation have now entered into this Joint Motion.
3. Each party will bear its own attorney’s fees and costs.



**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document by  
Notice of Electronic Filing on this 22<sup>nd</sup> day of September, 2016:

Debbie P. Kirkpatrick Esq.  
Sessions Fishman Nathan and Israel LLP  
1545 Hotel Circle South, Suite 150  
San Diego, CA 92108-3426  
Phone: (619) 758-1891  
Fax: (619) 296-2013  
Email: dkirkpatrick@sessions.legal  
Attorney for Defendant

DATED: September 22, 2016      /s/ Amy L. Bennecoff Ginsburg  
Amy L. Bennecoff Ginsburg Esq.  
Attorney for Plaintiff